

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No.: 4:23-CV-03560-KH

U.S. ANESTHESIA PARTNERS, INC.,

Defendant.

Joint Motion to Enter Supplemental Protective Order

On May 28, 2024, the Court entered an order on motion for protective order (ECF No. 152) adopting the protective order governing confidential and highly confidential materials filed at ECF No. 149-1. Based on discussions with a nonparty, the Federal Trade Commission and Defendant U.S. Anesthesia Partners, Inc. agree that good cause exists to enter a supplemental protective order governing the use of confidential and highly confidential materials in hearings and at trial in this matter. The parties respectfully request that the Court enter the attached Proposed Supplemental Protective Order (Exhibit A) as stipulated.

Date: December 30, 2024

Respectfully submitted,

/s/ Kara Monahan

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*Counsel for Defendant U.S. Anesthesia
Partners, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing Joint Motion to Enter Supplemental Protective Order and attached proposed order to be served on all counsel of record using the ECF system of the United States District Court for the Southern District of Texas.

Dated: December 30, 2024

/s/ Kara Monahan